South Columbia Basin Irrigation District

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March 23, 2012

Laurie Morgan
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Subject: Draft of General Permit No. WA-0991000

Dear Ms. Morgan:

Thank you for the opportunity to comment on the Irrigation System Aquatic Weed Control, National Pollutant Discharge Elimination System (NPDES), and State Waste Discharge General Permit draft. The South Columbia Basin Irrigation District has the following comments:

1) *S5.B7 For acrolein applications*

The District strongly disapproves of the wording in this section of the permit. Chapter 90.48 Revised Code of Washington does not grant Ecology authority to arbitrarily prohibit the use of an aquatic herbicide that is labeled for use in irrigation delivery systems. This section should be eliminated from the permit.

The Districts contracted with the United States Bureau of Reclamation to operate and maintain the irrigation systems of the Columbia Basin Project in 1969. For the past 42 years a program of integrated vegetation management and least use, most effective methods of aquatic weed control have been developed. Environmental protection and worker (applicator) safety have been the primary concern throughout development of our current programs.

The Districts have been leaders in research and product development for alternate vegetation products and methods. The current Irrigation System Aquatic Weed Control National Pollutant Discharge Eliminating System (NPDES) and State Waste Discharge General Permit is a direct result and evidence of the districts efforts to develop more environmentally sensitive approaches to weed control.

Columbia Basin Irrigation Districts have been operating under permit since 2002. Endothall products (more environmentally sensitive chemicals) have been available for District use for the last two years of our permit cycle. Between 2002 to 2009, the South Columbia Basin Irrigation District used between 96,000 and 108,000 lbs. of Magnacide H (acrolein), and approximately 20,000 lbs. of copper sulfate per year for aquatic

vegetation control. In 2010, the District began using Cascade (dipotassium salt of endothall) as an alternate to acrolein for aquatic weed control. The District used about 5,600 gallons of Cascade and was able to reduce acrolein use to about 42,000 lbs. This was an approximate 60% reduction in acrolein.

However, algae problems have developed throughout the irrigation systems, and copper sulfate was increased to about 30,000 lbs. This represented an increase of about 50% from 2002-2009 levels. In 2001, acrolein use was approximately 30,000 lbs. (about 30% of historic usage). Cascade use was again around 5,600 gallons, but continuing algae problems required the use of 34,000 lbs. of copper sulfate and resulted in less than desirable algae control. Compliance with effluent limits for copper was problematic during the early and latter portions of the irrigation season due to copper persistence in cold water.

Recent experience in integrating endothall (primarily Cascade) into management schemes has created more problems than it has solved. Endothall does not appear to be the "silver bullet" as we had hoped, and the learning curve is steep. Reducing acrolein use appears to cause greater dependence on copper compounds for algae control. Trading a less persistent herbicide (acrolein), which degrades to carbon monoxide and water, for the much more persistent copper compounds may not be the most environmentally responsible alternative.

2) *S11.A1b Discharge Monitoring Reports*
The requirement for submission of DMRs by the 25th of the following month does not allow adequate time to receive all results from the laboratory. The South District would like this permit requirement to remain unchanged from the current permit allowing until the 30th of the following month to submit DMRs.

3) *S11.A1c Discharge Monitoring Reports*
Since irrigation canals are operated seasonally, we would like to be able to submit DMRs for off-season months (Nov-Mar) in one report, rather than in individual reports, submitted monthly.

4) *S11.E3*
The time of analysis for acrolein should be unnecessary. The date of analysis is already included for all organic and metal parameters. This should be sufficient to determine if a sample was analyzed within the appropriate holding time for all the pesticides we are required to monitor, including acrolein.

Also, the time of sampling is already required for all samples, so it is redundant to place it as an additional requirement for acrolein.

5) *G19 Appeals*
"*Aquatic Noxious Weed Management general permit*" should be changed to "*Irrigation System Aquatic Weed Control National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit*".

Thank you again for the opportunity to comment on the proposed Irrigation System Aquatic Weed Control, National Pollutant Discharge Elimination System (NPDES), and State Waste Discharge General Permit No WA-0991000.

Sincerely,

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